

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Chapter 11

-----	:	Case No. 8-18-71748 (AST)
In re:	:	
	:	(Jointly Administered)
ORION HEALTHCORP, INC ¹ .	:	
	:	
Debtors.	:	Adv. Pro. No. 8-20-08039 (AST)
-----	:	
HOWARD M. EHRENBURG IN HIS CAPACITY	:	
AS LIQUIDATING TRUSTEE OF ORION	:	
HEALTHCORP, INC., ET AL.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
MOSHE FEUER; MIRIAM FEUER; BANK OF	:	
AMERICA CORPORATION D/B/A	:	
MERRILL LYNCH,	:	
	:	
Defendant(s)	:	
-----	:	

**STIPULATION FOR EXTENSION OF DEFENDANTS
MOSHE FEUER AND MIRIAM FEUER'S TIME TO
ANSWER THE COMPLAINT**

¹The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

Plaintiff and Defendants, Moshe Feuer and Miriam Feuer, each by and through their respective undersigned attorney, hereby stipulate and agree to extend the time for Defendant to file an answer to Plaintiff's complaint as provided for herein:

1. On March 12, 2020, Plaintiff filed a complaint [Dkt. No. 1] against Defendant Moshe Feuer and Miriam Feuer.

2. The Summons [Dkt. No. 2] was issued by the Clerk's Office on March 13, 2020.

3. On March 13, 2020, Defendant was served with the summons and complaint. Defendant does not challenge personal jurisdiction and waives any objection to service of process in this adversary proceeding.

4. Defendant does not waive any other defenses, objections or challenges which it may bring in this action other than as expressly stated in the previous paragraph

5. On April 13, 2020, the parties entered the *Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint* [Dkt. No. 3], which extended the Feuers' deadline to answer the Complaint through and including May 13, 2020, subject to further extension.

6. On May 13, 2020, the parties entered the *Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint* [Dkt. No. 5], which extended the Feuer's deadline to answer the Complaint through and including June 30, 2020, subject to further extension.

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7. On June 30, 2020, the parties entered the Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint [Dkt. No. 7], which extended the Feuer's deadline to answer the Complaint through and including July 30, 2020, subject to further extension.

8. The parties in good faith have exchanged certain documents, settlement positions, as well as exchanged a number of settlement offers. The most recent settlement offer was exchanged on August 28, 2020. Given the size of the matter, any settlement is subject to review and approval by the Oversight Committee. The parties desire to continue the settlement discussions but are impinging on a number of deadlines including the Pre-trial Conference set for September 21, 2020. The Parties seek a further extension to allow them time to complete these informal settlement discussions as well as to continue the Pre-trial Conference 30-60 days, and any applicable deadlines, or to a date convenient with the Court's calendar.

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9. The extension is not sought for any improper purpose or to delay the proceeding.

WHEREFORE, the parties agree that the time by which Defendant is required to answer the Complaint is hereby extended through and including October 30, 2020.

Dated: September 4, 2020

PACHULSKI STANG ZIEHL & JONES LLP
Attorneys for Plaintiff Howard M.
Ehrenberg in his capacity as Liquidating
Trustee of Orion Healthcorp, Inc., et al

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Dated: September 4, 2020


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SO ORDERED

Dated: October 7, 2020
Central Islip, New York




Alan S. Trust
Chief United States Bankruptcy Judge